

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BRUCE CORKER d/b/a RANCHO ALOHA, et al.,

Plaintiffs,

v.

COSTCO WHOLESALE CORPORATION, a  
Washington corporation; et al.,  
Defendants.

No. 2:19-cv-00290-RSL

**DECLARATION OF TRENTON  
NORRIS ON BEHALF OF  
SETTLING DEFENDANTS  
L&K AND KIHNKE RE: NO  
OBJECTION TO  
SETTLEMENT FROM USAG  
PER CAFA**

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DECLARATION OF TRENTON NORRIS

**HPS ASSOCIATES APC**  
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1  
2  
3 DATED January 23, 2023

HPS ASSOCIATES APC

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By s/ GREGORY M. HATTON

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By s/ MICHAEL G. ATKINS

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## **EXHIBIT 1**

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BRUCE CORKER d/b/a/ RANCHO  
ALOHA, et al.,

Plaintiffs,

v.

COSTCO WHOLESALE  
CORPORATION, a Washington  
corporation, et al.,

Defendants.

Case No.: 2:19-cv-00290-RSL

**DECLARATION OF TRENTON H.  
NORRIS REGARDING NOTICE TO  
FEDERAL AND STATE  
OFFICIALS PURSUANT TO THE  
CLASS ACTION FAIRNESS ACT**

1 I, Trenton H. Norris, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney  
3 at Arnold & Porter Kaye Scholer LLP, special counsel for defendant L&K Coffee  
4 Company, LLC d/b/a Magnum Coffee Roastery ("L&K"). The facts set forth herein  
5 are of my own personal knowledge, as well as upon information provided to me by  
6 employees of Arnold & Porter Kaye Scholer LLP, and if called and sworn as a  
7 witness, I could and would competently testify thereto.

8 2. I directed the issuance of notice to the appropriate Federal and  
9 State officials pursuant to the Class Action Fairness Act of 2005 ("CAFA"), 28 U.S.C.  
10 § 1715(b), on behalf of L&K.

11 3. Notice was duly mailed on October 12, 2022, to the appropriate  
12 Federal and State officials identified in the attachment to the notice. A copy of the  
13 notice is attached hereto as Exhibit A.

14 4. As of the date of this Declaration, Arnold & Porter Kaye Scholer  
15 LLP has not received any inquiries or objections from any State or Federal officials  
16 related to the notice.

17  
18 I declare under penalty of perjury that the foregoing is true and correct.

19 Executed January 13, 2023, at San Francisco, California.

20  
21 

22  
23 Trenton H. Norris

# **EXHIBIT A**



Trenton H. Norris  
+1 415.471.3303 Direct  
Trent.Norris@arnoldporter.com

October 12, 2022

**VIA U.S. MAIL**

United States Attorney General  
And State Attorneys General  
Identified in Attachment A

Re: CAFA Notice of Proposed Class Action Settlement,  
*Corker, et al. v. Costco Wholesale Corporation, et al.*,  
No. 2:19-cv-00290-RSL (W.D. Wash.)

Dear Counsel:

Pursuant to the Class Action Fairness Act ("CAFA"), 28 U.S.C. § 1751(b), L&K Coffee Company, LLC d/b/a Magnum Coffee Roastery ("L&K") hereby serves notice of a proposed settlement in *Corker, et al. v. Costco Wholesale Corporation, et al.*, No. 2:19-cv-00290-RSL (the "Action"), pending in the United States District Court for the Western District of Washington (the "Court").

A motion for preliminary approval of the proposed settlement in the Action was filed with the Court on October 3, 2022. The Court granted preliminary approval of the settlement on October 4, 2022, and scheduled a final approval hearing for February 16, 2023 at 11:00 a.m. L&K denies the allegations in the Action and denies any liability, but has decided to settle the Action solely to eliminate the burden, expense, and uncertainty of further litigation.

Copies of all materials filed in the Action are electronically available on the Court's Pacer website found at <https://pacer.uscourts.gov/>. Additionally, pursuant to 28 U.S.C. § 1715(b), the enclosed USB flash drive contains the following documents:

1. The Original Complaint filed on February 27, 2019 [Dkt. #1], the First Amended Complaint filed on May 21, 2019 [Dkt. #81], the Second Amended Complaint filed on April 30, 2020 [Dkt. #271], and the Third Amended Complaint filed on January 8, 2021 [Dkt. #381].
2. Plaintiffs' Motion for Preliminary Approval of Class Settlement and Memorandum in Support, filed on October 3, 2022 [Dkt. #706], and all attachments and exhibits [Dkt. #702, 703], including:



United States Attorney General  
October 12, 2022  
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- a. The Settlement Agreement, fully executed on September 15, 2022;
  - b. The proposed long-form notice to class members;
  - c. The proposed publication notice to class members.
3. The Court's Order Granting Plaintiffs' Motion for Preliminary Approval of Class Settlement and Directing Issuance of Notice [Dkt. # 707].
  4. List of Class Members by State.
  5. Proportionate Share of Class Members by State.

If you have any questions regarding the foregoing materials or the details of the case and settlement, please contact me directly.

Sincerely,

ARNOLD & PORTER KAYE SCHOLER LLP

By:   
Trenton H. Norris

Enclosures



***Corker, et al. v. Costco Wholesale Corporation, et al.*, No. 2:19-cv-00290-RSL (W.D. Wash)**  
**CAFA Notice - Attachment A - Service List**

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***Corker, et al. v. Costco Wholesale Corporation, et al.*, No. 2:19-cv-00290-RSL (W.D. Wash)**

**CAFA Notice - Attachment A - Service List**

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***Corker, et al. v. Costco Wholesale Corporation, et al.*, No. 2:19-cv-00290-RSL (W.D. Wash)**  
**CAFA Notice - Attachment A - Service List**

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***Corker, et al. v. Costco Wholesale Corporation, et al.*, No. 2:19-cv-00290-RSL (W.D. Wash)**  
**CAFA Notice - Attachment A - Service List**

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 23, 2023, I electronically filed the preceding document with the Clerk of the Court using the CM/ECF system which will send notification to the counsel of record in this case.

I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge.

Dated January 23, 2023, at Aliso Viejo, California.

HPS ASSOCIATES APC

By: */s/ John A. McMahon*

John A. McMahon, Attorney